REMARKS

This application has been carefully reviewed in light of the non-final Office Action dated February 6, 2009. Claim 16 has been cancelled without prejudice or disclaimer of subject matter. Claims 13, 14, 17-19, 21-23, 25, and 26 have been amended and claim 34 has been added. Claims 13-15, 17-19, and 21-34 remain in the application, of which claims 1, 32, and 33 are the independent claims. Reconsideration and further examination are respectfully requested.

Interview Summary

Initially, Applicants' undersigned representative thanks Examiner Abdelsalam and Examiner Nguyen for the thoughtful courtesies and kind treatment afforded during the personal interview conducted on April 16, 2009. During the interview, Examiner Abdelsalam, Examiner Nguyen, and the Applicants' representative discussed amended independent claim 13 with respect to the cited references. Examiner Abdelsalam and Examiner Nguyen indicated that the "[p]roposed amendments of independent claims appear to read over the art, but Examiner will further review art to make definitive conclusion." Interview Summary of April 16, 2009. This reply reflects the substance of the interview.

§ 101 Rejections

Claims 13-16, 18, and 19 were rejected as being directed to non-statutory subject matter. Applicants have amended independent claim 13 and submit that the amendments to independent claim 13 address all of the issues raised in the Office Action. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

§ 103 Rejections

Claims 13-19, 21, 22, and 25-33 were rejected over Mahoney (U.S. Patent No. 5,563,991) in view of Guzelsu (U.S. Patent No. 6,381,587), and claims 23 and 24 were rejected over Mahoney in view of Guzelsu and Kennedy (U.S. Patent No. 6,031,547). Based on the following remarks and the discussion in the personal interview of April 16, 2009, withdrawal of the rejections and further examination are respectfully requested.

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Referring to particular claim language, independent claim 13, as amended, recites a method comprising, inter alia, calculating, using a portion of the utilization information that specifies monetary value of contracts associated with the identified instances, overlap statistics characterizing a degree, with respect to the monetary value, to which interactions of the first independent agency and at least one common service-provider overlap with interactions of the second independent agency and the at least one common service-provider.

Independent claims 32 and 33, although different in scope from claim 13 and each other, recite features similar to those discussed above with respect to independent claim 13.

The applied references are not seen to disclose, teach or suggest the foregoing features recited by the independent claims. In particular, as discussed in the personal interview of April 16, 2009, the applied references fail to disclose at least, calculating, using a portion of the utilization information that specifies the monetary value of contracts associated with the identified instances, overlap statistics characterizing a degree, with respect to the monetary value, to which interactions of the first independent agency and at least one common service-provider overlap with interactions of the second independent agency and the at least one common service-provider.

Specifically, Mahoney describes a system that inputs an image of a perimeter relationship representation, such as a Venn diagram, analyzes the image to identify perimeters of shapes within the image, and obtains perimeter data based on the identified perimeters of shapes within the image. See Mahoney at Abstract, col. 1, lines 40-58, and FIG. 9. In obtaining perimeter data of an image, however, the Mahoney system does not calculate, using a portion of the utilization information that specifies monetary value of contracts associated with the identified instances, overlap statistics characterizing a degree, with respect to the monetary value, to which interactions of the first independent agency and at least one common service-provider overlap with interactions of the second independent agency and the at least one common service-provider. Rather, the Mahoney system analyzes an image to identify perimeters of shapes within the image.

Guzelsu fails to remedy the deficiencies of Mahoney discussed above. In particular, Guzelsu is directed to a system that reconciles vendor invoices for products and services with actual usage by individual users within a company. See Guzelsu at col. 3, lines 48-60, col. 4,

lines 28-43, and FIG. 9. In reconciling vendor invoices, however, the Guzelsu system does not consider overlap of interactions of a first user and a second user with a common service-provider, much less calculate, using a portion of the utilization information that specifies monetary value of contracts associated with the identified instances, overlap statistics characterizing a degree, with respect to the monetary value, to which interactions of the first independent agency and at least one common service-provider overlap with interactions of the second independent agency and the at least one common service-provider.

Notably, during the personal interview, Examiner Abdelsalam and Examiner Nguyen agreed that these features appear to read over the applied references, although further search and consideration is needed. Accordingly, for at least these reasons, the Applicant respectfully requests reconsideration and withdrawal of the rejection of independent claims 13, 32, and 33.

The other rejected claims and new claims in the application are each dependent on these independent claims and are thus believed to be allowable over the applied references for at least the same reasons. Because each claim is deemed to define additional aspects of the disclosure, however, the individual consideration of each claim on its own merits is respectfully requested.

All of the pending issues have been addressed. However, the absence of a reply to a specific rejection, objection, issue, or comment, including the Office Action's characterizations of the references, does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment or cancellation of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment or cancellation. Since the amendments made herein have been made solely in an effort to expedite advancement of this case, the Applicant reserves the right to prosecute the rejected claims in further prosecution of this or related applications.

No other matters being raised, it is believed that the entire application is fully in condition for allowance and such action is courteously solicited.

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Respectfully submitted,

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